

REMARKS/ARGUMENTS

Claims 11-19, 30-38, 40, and 41 are pending. Claims 11, 16, 19, 30, 38, 40, and 41 have been amended.

In the Office Action of June 15, 2006 ("Office Action"), the Examiner rejected claims 11-15, 17-19, 30-34, 36-38, and 40-41 under 35 U.S.C. §103(a) as allegedly being unpatentable over Acrobat Reader in view of Nielsen (U.S. Pat. 6339437), further in view of Hart (U.S. Pat. 5546502). Claims 16 and 35 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Acrobat Reader in view of Nielsen, further in view of Hart, further in view of Okamoto (U.S. Pat. Publ. 2002/0065814).

- I. The instant claims find support in a parent application that predates Acrobat Reader and Okamoto, thus Acrobat Reader and Okamoto are not valid prior art references.

The instant application is a continuation-in-part that claims priority to U.S. Patent Application No. 08/995,616 ("the parent application") that was filed on December 22, 1997. The parent application predates the publication of Acrobat Reader (published in 1999) and the filing date of Okamoto (filed on June 30, 1999 but which is a continuation to U.S. Patent Application No. 09/107,986 that was filed on June 30, 1998). Applicants submit that the instant claims find support in the parent application and thus predate Acrobat Reader and Okamoto, so that Acrobat Reader and Okamoto are not valid prior art references.

A. Independent claim 11 finds support in the parent application

Claim 11 recites a method of displaying a document using a browser. User input of a selection of a first concept is received, and a section of the document is displayed in a first viewing area of a display. Contents of the document are extracted and a single thumbnail image is displayed in a second viewing area of the display based on the contents extracted from the document. An area of the single thumbnail image is emphasized corresponding to the section of the document displayed in the first viewing area. The contents of the single thumbnail image are dynamically changed to reflect a change in the display of the document in the first viewing area. Extracting the contents of the document comprises extracting one or more text entities,

determining location information for the one or more text entities, determining if the one or more text entities are relevant to the first concept, and associating each text entity that is relevant to the first concept with style information for the first concept, wherein the style information for the first concept indicates a manner of annotating text entities which are relevant to the first concept.

As illustrated in the parent application at least at FIGs. 2B, 2C, and 2D, text entities associated with user-selected concepts may be annotated using various styles of annotation, and the annotated text entities may be displayed in a first viewing area of a display. For example, as described at page 5 lines 9-28 of the parent application, text phrases (e.g., "expert system" and "intelligent agent" in FIG. 2B) may be annotated by highlighting in color, being displayed in bold text, and/or being shown with marginal annotation, as illustrated in FIG. 2B. Alternatively, the style of annotation may include highlighting entire sentences where text phrases are displayed in bold text, as shown in FIG. 2C. As a further alternative, the style of annotation may include a balloon graphic element that may include the name of the concept to which the text entity is relevant, as depicted in FIG. 2D.

As described in the parent application at least at page 12 lines 10 to 26, a thumbnail image is synchronized to the display shown in the first viewing area, such that the contents of the single thumbnail image are dynamically changed to reflect a change in the display of the document in the first viewing area:

Within elongated thumbnail image 214 [of FIGs. 2A-2D], an emphasized area 214A shows a reduced view of the document section currently displayed in first viewing area 215 with the reduction ratio preferably being user-configurable. Thus, if the first viewing area 202 changes in size because of a change of window size, emphasized area 214A will also change in size accordingly. The greater the viewing area allocated to elongated thumbnail image 214 and emphasized area 214A, the more detail is visible. With very small allocated viewing areas, only sections of the document may be distinguishable. As the allocated area increases, individual lines and eventually individual words become distinguishable. In Figs. 2A-2D the user-configured ratio is approximately 5:1. Emphasized viewing area 214 may be understood to be a lens or a viewing window over the part of elongated thumbnail image 214A corresponded to the document section displayed in first viewing area 215. User 504 may scroll

through document 502 by sliding emphasized area 214A up and down. As emphasized area 214A shifts, the section of document 502 displayed in first viewing area 202 will also shift. User 504 may also scroll conventionally using scroll bar 204 or arrow keys and emphasized area 214A will slide up or down as appropriate in response.

Applicants thus submit that claim 11 finds support in the parent application. Because the parent application predates Adobe Acrobat and Okamoto, Adobe Acrobat and Okamoto are not valid prior art references as to claim 11. For at least this reason, Applicants submit that the Examiner has not shown a *prima facie* case of obviousness and that claim 11 is patentable.

B. Independent claims 19, 30, 38, 40, and 41 find support in the parent application

In similar fashion to that described with respect to claim 11, independent claims 19, 30, 38, 40, and 41 find support in the parent application to the effect that Adobe Acrobat and Okamoto are not valid prior art references as to these claims.

For example, claim 19 recites a method of displaying a document using a browser. User input selecting a first concept is received, and one or more text patterns that are associated with the first concept are identified. The document is searched to identify occurrences of the one or more text patterns. A section of the document is displayed in a first viewing area of a display such that the occurrences of the text patterns are annotated. A single thumbnail image is displayed in a second viewing area of the display. The contents of the single thumbnail image is dynamically changed to reflect a change in the display of the document in the first viewing area. An area of the single thumbnail image is emphasized corresponding to the section of the document displayed in the first viewing area.

For at least the reasons stated with respect to claim 11, claim 19 finds support in the parent application (see patent application page 5 lines 9-28, page 12 lines 10-26, FIGs. 2B-2D). Because the parent application predates Adobe Acrobat and Okamoto, Adobe Acrobat and Okamoto are not valid prior art references as to claim 19. For at least this reason, Applicants

submit that the Examiner has not shown a *prima facie* case of obviousness and that claim 19 is patentable.

In similar fashion to that described with respect to claims 11 and 19, independent claims 30, 38, 40, and 41 find support in the parent application. Claims 30 and 40, for example, include many of the elements found in claim 11, and are patentable for at least the same reasons stated with respect to claim 11, among others. Claims 38 and 41 include many of the elements found in claim 19, and are patentable for at least the same reasons stated above, among others.

II. The instant claims are not obvious over the cited references

In addition to the comments above, Applicants present the following remarks that distinguish the instant claims from the cited references.

A. Claim 11

Claim 11 has been amended to further distinguish from Adobe Acrobat and now recites, "dynamically changing the contents of the single thumbnail image to reflect a change in the display of the document in the first viewing area." Thus, for example, a user may cause a change in the display of the document in the first viewing area by modifying a style associated with annotations of text entities from bolded to underlined text. This style change may cause a change in the display of the document in the first viewing area where all previously bolded text entities are now changed to underlined text entities. Accordingly, the previously bolded text entities in the contents of the thumbnail image are dynamically changed to underlined text entities. The change is made throughout the contents of the thumbnail, irrespective of the section of the document viewed by the user in the first viewing area.

Applicant submits that Adobe Acrobat does not teach or suggest this concept of dynamically changing the contents of the thumbnail to reflect a change in the display of the document in a first viewing area. Applicants submit that in Acrobat, the size or location of the thumbnail window changes with a change in the size or location within a document, but the contents of the thumbnail image is not dynamically changed as recited in claim 11

As to Nielsen with respect to claim 11, the Office Action alleges at page 3 that "Nielsen discloses a method in which a document is accessed and it is searched to identify text patterns that are relevant to user queries (plurality of concepts)."

However, a "concept" as recited in claim 11 is completely different from a "user query" or "query term" as described in Nielsen. In Nielsen, a document is searched for terms that are provided by the user as part of the query--i.e., the user has to explicitly specify terms to be searched, and the explicit query terms themselves are searched for in the document. Occurrences of only the explicitly specified terms are marked in the document (See Nielsen: col. 1 lines 17-22, lines 37-40; col. 4 lines 56-61; Figs. 2A and 2B).

This is not the case in claim 11 where concepts are provided--not query terms. A set of text patterns is then determined for the concepts and the document is then searched for the set of text patterns. Applicants thus submit that the "concept" recited in claim 11 is quite different from the "user query" or "query term" described in Nielsen. Applicants thus submit that the feature of "receiving information identifying a set of concepts" is not taught or suggested by Nielsen.

With respect to Hart, the Office Action alleges at page 4 that "Hart discloses a method in which a user selects concepts (symptoms) and the system searches for the concepts and commonly known keywords (faults) associated with the concepts in the document." In contrast, Hart does not "search for concepts" but rather develops a context which reflects a current state of a user's interaction with the expert system, so that the expert system can locate relevant information pertaining to symptoms which make up that context. Thus, Hart does not "search for concepts" as the Examiner alleges. Furthermore, Hart teaches away from providing full-text searches of the sort provided by Nielsen, such that a person of ordinary skill in the art would not combine Hart with the other references in a manner suggested by the Examiner. As such, Applicants submit that amended claim 11 is not made obvious thereby.

Applicants thus submit that amended claim 11 is allowable over Acrobat, Nielsen, and Hart and is in a condition for allowance.

B. Independent claims 19, 30, 38, 40, and 41

Independent claims 19, 30, 38, 40, and 41 have been amended to further distinguish from Adobe Acrobat and now recite, "dynamically changing the contents of the single thumbnail image to reflect a change in the display of the document in the first viewing area." As noted above with respect to claim 11, the cited references do not teach or suggest dynamically changing the contents of the thumbnail image to reflect a change in display of the document in the first viewing area.

C. Dependent claims

Applicant submits that the dependent claims which depend either directly or indirectly from independent claims 19, 30, 38, 40, and 41 should be allowed for at least a similar rationale as discussed for allowing the independent claims, and others. Further, the dependent claims recite additional features which make the claims patentable for additional reasons.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

/george b. f. yee/

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